

# Federal Defenders OF NEW YORK, INC.

Southern District  
52 Duane Street-10th Floor, New York, NY 10007  
Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton  
*Executive Director*

*Southern District of New York*  
Jennifer L. Brown  
*Attorney-in-Charge*

June 29, 2021

BY ECF

Honorable John P. Cronan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York NY 10007

**Re:    United States v. Raul Gutierrez-Campos  
          21 Cr. 40 (JPC)**

Dear Judge Cronan,

I write to request a modification to Mr. Gutierrez-Campos's bail conditions in the above-captioned case. Specifically, we ask the Court to replace his "home detention" condition with "curfew enforced by location monitoring" with the curfew time to be set by Pretrial Services.

Mr. Gutierrez-Campos was released on bail on January 22, 2021. See Dkt. No. 9. Pretrial Services by Officer Ashley Cosme reports that Mr. Gutierrez-Campos has been very compliant with the terms of his release to date. He has continued to work 6 days per week. The requested modification will give Mr. Gutierrez-Campos an opportunity to run personal errands (such as getting a haircut, doing laundry, etc.) on the one day a week that he is not at work. If this request is granted, Mr. Gutierrez-Campos will continue to wear an electronic monitoring bracelet.

Pretrial Services by Officer Cosme and the government by Assistant United States Attorney David Robles both have no objection to this request.

Thank you for your consideration

Respectfully submitted,  
/s/  
Sylvie Levine  
212-417-8729

**SO ORDERED:**

  
**HONORABLE JOHN P. CRONAN**  
United States District Judge

cc: Pretrial Officer Cosme & A.U.S.A. Robles (by email)